



COMMITTEE CORRESPONDENCE

Address Writer at

ENVIRONMENTAL ACTIVITIES STAFF, GENERAL MOTORS CORPORATION
GENERAL MOTORS TECHNICAL CENTER, WARREN, MICHIGAN 48090

September 30, 1985

Ms. Janet Feldstein
U.S. Environmental Protection Agency
Region 2
26 Federal Plaza
Room 400
New York, NY 10278

Re: Revised RI/FS Work Plan
SCP - Carlstadt, New Jersey

Dear Ms. Feldstein:

Enclosed are nine (9) copies of the revised Remedial Investigation/Feasibility Study (RI/FS) work plan for the Scientific Chemical Processing, Carlstadt, New Jersey (SCP-C) site. Every effort has been made to ensure this document properly reflects the agreement reached on September 20, 1985 at a meeting between EPA and SCP-C Steering and Technical Committee representatives.

As was discussed at this meeting, we are convinced that the continued presence of the tanks and trailer on-site would prevent us from properly performing the field investigation phase of the RI/FS. The problems anticipated, if the tanks remain, include:

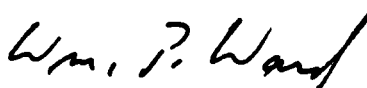
1. Interference with geophysical exploration -- the masses of metal will preclude the magnetometer survey in the vicinity of the tanks.
2. Interference with well location and sampling -- the work plan calls for a well and soil sampling in the tank farm area; if the tanks remain, these samples cannot be collected.
3. Interference with topographic survey -- optical level lines cannot run through solid objects like tanks; also ground elevations beneath the tanks cannot be determined, thus, the topographic survey will be incomplete.
4. Removal of the tanks could spread contamination -- if the tanks are removed after study completion, such contamination might not be adequately quantified.

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Even though certain portions of the RI/FS could begin while the tanks are on site, I strongly recommend against beginning field work until the tanks are removed. In my technical opinion, to undertake field work with the tanks on-site would require compromising sampling locations and the geophysical surveys. I urge the Agency to reconsider its position that the RI/FS commence whether or not the tanks are still on-site.

For the SCP-C
Technical Committee



W. P. Ward

WPW/ke
Enc. (9)

cc: T. M. Armstrong - Steering Committee (w/o enc.)
Technical Committee (w/o enc.)
cc: Kathleen J. Chojnowski - EPA (w/o enc.)

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